

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,)	CASE NO. 8:21CR212
)	
Plaintiff,)	
)	
vs.)	MOTION TO CONTINUE
)	TRIAL
RAMZI YASSINE,)	
)	
Defendant.)	

COMES NOW the Defendant, Ramzi Yassine, by and through undersigned counsel, and hereby requests a continuance of the trial currently scheduled for January 3, 2021 for sixty days. In support thereof, it is stated as follows:

1. Plea negotiations are ongoing.
2. Assistant United States Attorney, Donald Kleine, has no objection to this request.
3. The Defendant requests that the period of delay resulting from this continuance be excluded from speedy trial calculations pursuant to 18 USC §3161 since the ends of justice served by granting the continuance will outweigh the best interest of the public and the defendant in a speedy trial.

WHEREFORE, the Defendant prays the Court grant a sixty-day continuance of the trial, and find that the period of the continuance be excluded from the speedy trial calculation.

Respectfully submitted this 2nd day of December, 2021.

RAMZI YASSINE, Defendant,

By: s/Sean M. Conway
SEAN M. CONWAY, #23490
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CERTIFICATE OF SERVICE

I hereby certify that on December 2, 2021, I electronically filed the foregoing Motion with the Clerk of the District Court using the CM/ECF system which sent notification of such filing to the following:

Donald J. Kleine, Assistant United States Attorney

and I hereby certify that I have mailed by United States Postal Service the document to the following non CM/ECF participants:

N/A

s/Sean M. Conway
SEAN M. CONWAY, #23490
Attorney for Defendant